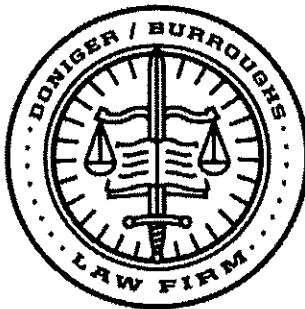


Stephen M. Doniger  
Scott Alan Burroughs  
Trevor W. Barrett  
Frank Gregory Casella  
Justin M. Gomes  
David R. Shein\*  
Mathew DiNicola\*^  
Emily A. Danchuk\*+  
Michael D. Steger\*+  
\*Of Counsel  
^Admitted in Texas  
+Admitted in New York



Doniger / Burroughs Building  
603 Rose Avenue  
Venice, California 90291

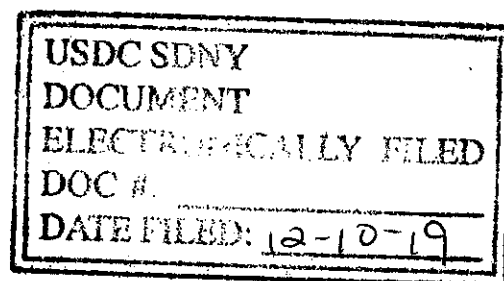
New York Office  
295 Madison Avenue, 22<sup>nd</sup> Floor  
New York, New York 10017

Sender's contact:  
michaelt@donigerlawfirm.com  
(646) 517-0600

December 5, 2019

**VIA ECF**

Honorable Loretta A. Preska  
United States District Court Southern District of New York  
500 Pearl Street  
New York, NY 10007



Re: *Stross v. Tango Publishing Corporation, et al*, 19-CV-2189-LAP

Dear Judge Preska:

This firm represents plaintiff Alexander Stross in this copyright infringement matter. I am writing pursuant to Local Rule 37.2 to request a pre-motion conference regarding defendant Tango Publishing Corporation's failure to respond to our discovery requests.

On August 27, 2019, I served Plaintiff's First Requests for Production of Documents and First Set of Interrogatories. Defendant has not responded to this discovery despite my repeated requests. Defendant has also not provided its Rule 26 disclosures, which I have also requested multiple times.

The parties have negotiated a stipulated protective order, which we will be submitting to the Court shortly. However, the submission (or non-submission) of a protective order has no bearing on Defendant's failure to comply with its obligations in this case.

Thank you for your consideration of this request.

Sincerely yours,

By: /s/ Michael D Steger  
Michael D. Steger  
for the Firm

cc: All counsel (via ECF)

*Counsel shall appear for a conference on January 6, 2020 at 3:00.*

295 Madison Avenue / New York, New York 10017  
Telephone: (646) 517-0600 / www.donigerlawfirm.com

12/9/19

12/9/19  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE